



September 24, 2019

Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, DC 20554

**RE: WC Docket No. 18-213. Promoting Telehealth for Low-Income Consumers.**

Dear Commissioner:

I write to you today in response to the notice of proposed rule related to telehealth in low-income communities. For more than 50 years, the St. Andrew Lutheran Church has been a stable and grounding environment in the Montbello community of Denver, CO. We provided elementary education to this community up until six years ago. Right about then, a charter school was placed right across the street and we lost our kids as well as a needed revenue stream.

Well, over the last four years, our efforts have been to find a replacement for the school. As you will see in the attached flyer, we have endeavored to repurpose our school into affordable assisted living. This innovative facility will pilot telehealth as a central service element. Most recently, we have installed a fiber optic service that will allow us synchronous data transfer. Further, we have developed a relationship with a supplier, provider, and telefacilitator to credential our location for Medicaid (and potentially Medicare) reimbursement. Our property is within a Healthcare Provider Shortage Area, a Qualified Census Tract, a Disadvantaged Development Area, and is experiencing the pressures of gentrification.

Glory be, we have persevered and are weeks away from groundbreaking. We have raised significant grant funding, donations, and are now in the final phase of issuing tax-exempt bonds to complete the financing. The EPA, State of Colorado, Colorado Health Foundation, Next50 Initiative, and many individuals have all generously provided resources to move this project forward. Our anticipated groundbreaking is October 12, 2019.

We humbly request, through this docket, the FCC consider including "faith based organizations" on your list of Providers. All of us need to participate in the care of the baby-boomers. Only with your help may the Churches continue to provide care to our communities.

Sincerely,  
Peter Joseph Hynes

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Since 1968, St. Andrew Lutheran Church has served the Montbello community in northeast Denver. Until five years ago, the St. Andrew Lutheran School was a thriving place for 120 elementary school students. Now, the classroom wing is unused and needs a new meaningful purpose. Rather than selling the property and losing a community gem, Urbitecture proposes to repurpose the school into a residential board and care facilities – Open Arms Assisted Living. Open Arms will provide 30 beds of person-centered assisted living within two households. Resident amenities include telehealth, gardening, activities, family visits, ice-cream socials, and shared living/dining spaces. We will repurpose an existing 13,309 SF school and construct an additional 7,000 SF (approximately) on 3.4 acres. Sixteen Medicaid and 14 private pay assisted living residents will replace the elementary students and St. Andrew Lutheran will remain a community anchor.



Nearly 4 years in planning and pre-development, this project required re-zoning, a partial change of use, upgraded life safety features, a major redesign, hazardous material abatement, upgraded mechanical and electrical systems, myriad approvals, and navigation between Church and State.



As we all know, we are experiencing a crisis in the affordable assisted living market. While keeping the Church in community, Open Arms will serve Medicaid and lower income private pay residents in a setting conducive to better health, a property conducive to better care, and telehealth technology conducive to lower costs. We anticipate an October 2020 completion.